

2.17 Pollution Incident Response Management Plan



This Pollution Incident Response Management Plan must be prepared for all **Projects based in NSW that hold an Environment Protection Licence (EPL)**, or for any project if directed to prepare one by the EPA.

It is a requirement under Clause 98D of the POEO Amendment Regulations 2012 that certain sections of the Plan are made publicly available on the website within 14 days after being prepared and approved for issue. The sections are those that cover procedures for contacting the relevant authorities and communicating with the community.

Sections 1 and 2 of the Abercrombie Precinct Redevelopment Pollution Incident Response Management Plan meet the requirements of Clause 98D and have been extracted made available on the John Holland website.

1) External Notification Protocol

The following authorities must be contacted in the order below.

| | Authority | Phone Number |
|---|---|---|
| 1 | EPA - Hotline | 131 555 |
| 2 | EPA (EPA Officer) | (02) 9995 6816 |
| 3 | Ministry of Health – via the local Public Health Unit | http://www.health.nsw.gov.au/publichealth/Infectious/phus.asp |
| 4 | Workcover NSW | 131 050 |
| 5 | Local Authority – City of Sydney Council (CSC) | (02) 9265 9333 |

2) Community Notification and Action Protocol

The following table lists the mechanisms to be followed in the event that a pollution incident has the potential to impact the surrounding community, in order to minimise the risk of harm.

| Pollution Incident Scenario | Potential Impacts | What to do | Who to Notify | When | Communication Mechanism |
|---|---------------------------------------|---|---|--|-------------------------|
| Sediment laden water, hydrocarbon or chemical entering stormwater drain | people and waterways | Bund area and block stormwater drain to prevent further pollution | University, adjacent residents / businesses | Immediately During clean-up of incident | Telephone Door knock |
| Dust / Odours | Air quality issues Loss of amenity | Cease works immediately | University, adjacent residents / businesses | Immediately Whilst applying mitigation measures | Telephone Door knock |

3) Risk Assessment

| Hazard | Impact (Human Health and/or Environment) | Inherited Risk Level (A, B, C, D or E) | Pre-emptive Actions | Residual Risk Level (A, B, C, D or E) |
|---|--|--|--|---------------------------------------|
| Sediment laden water off site, including mud tracked onto roadways | Environment | D | -Construction Environmental Management Plan - Implement controls identified on ESCPs - procedures for dewatering | E |
| Pollution of land or stormwater from Hydrocarbon spills from machinery or fuel storage. | Human Health and/or Environment | D | - Plant Hazard Assessments - Daily Plant Checklists; - Environmental Management Plan (CEMP) | E |
| Generation of dust from mobile equipment / vehicles and exposed areas | Human Health and/or Environment | C | - traffic movement onsite to no greater than 20km/h -Dust suppression to occur - trucks to cover loads | D |
| Impacts to residents due to noise, vibration and visual pollution. | Human Health and/or Environment | C | - Comply with approved hours of operation. - Communicate with staff and community the approved hours of work - Program high noise activities for standard construction hours and apply required respite periods. | D |

| | | | | | | |
|--------------------------|-----------------------|---------------------------|---|---|---|---|
| Likelihood rating | Almost Certain | D | C | B | A | A |
| | Likely | D | D | C | B | A |
| | Possible | E | D | C | C | B |
| | Unlikely | E | E | D | C | B |
| | Rare | E | E | D | D | C |
| | | 1 | 2 | 3 | 4 | 5 |
| | | Consequence rating | | | | |

Likelihood Rating

| Rating | Criteria |
|-----------------------|--|
| Almost Certain | <ul style="list-style-type: none"> • >99% probability, or • expected to occur in most circumstances, or • could occur within “days to weeks” • will occur repeatedly without corrective action being taken. |
| Likely | <ul style="list-style-type: none"> • 50 - 99% probability, or • will probably occur in most circumstances, or • could occur within “weeks to months” |
| Possible | <ul style="list-style-type: none"> • 20 - 50% probability, • might occur at some time, or • could occur within “months to years” |
| Unlikely | <ul style="list-style-type: none"> • 1 - 20% probability, or • could occur but would not be expected, or • could occur in “years to decades” |
| Rare | <ul style="list-style-type: none"> • <1% probability • occurrence requires exceptional circumstances • only occur as a “100 year event” |

Risk Consequence Rating

| Rating | Environment & Heritage | Reputation and Community | Regulatory |
|--------|--|--|--|
| 5 | <ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery in 5 to 10 years • Detrimental impact on one or more protected/ endangered flora or fauna with functional recovery in 5 to 10 years | <ul style="list-style-type: none"> • National press reporting for a day • Consistent and extreme local negative media attention (month) • Significant adverse community impact & condemnation • Stakeholder action will prevent achievement of the project objectives • Manager may be asked to leave | <ul style="list-style-type: none"> • Major breach of regulation with punitive fine. • Significant litigation involving many weeks of senior John Holland management time. • Shut down of whole project for short period due to regulatory breach. |
| 4 | <ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery in 1 to 5 years • Detrimental impact on one or more protected/endangered flora or fauna with functional recovery in 1 to 5 years | <ul style="list-style-type: none"> • Consistent local negative media attention (weeks) • Considerable and prolonged adverse community impact and dissatisfaction publicly expressed. • Stakeholder action will prevent achievement of major elements of the Project. • Disciplinary action likely | <ul style="list-style-type: none"> • Breach of regulation with investigation or report to authority with prosecution and/or moderate fine possible. • Shut down of part of a project due to regulatory breach |
| 3 | <ul style="list-style-type: none"> • Detrimental offsite impact with functional recovery within 1 year. • Detrimental impact on a protected/ endangered flora or fauna with functional recovery within 1 year • Significant irreversible detrimental impact that is contained on-site | <ul style="list-style-type: none"> • Negative local media attention (days) • Sectional community impacts and concerns publicly expressed (days) • Stakeholder action will disrupt planned project activities. • Disciplinary action may be taken | <ul style="list-style-type: none"> • Legal issues due to non-compliances and breaches of regulation. |
| 2 | <ul style="list-style-type: none"> • Significant detrimental impact that is contained on-site and is fully reversible | <ul style="list-style-type: none"> • Brief negative local media coverage • Minor stakeholder complaints resolved by initial contact. • Employees warned only | <ul style="list-style-type: none"> • Technical breach of regulation. |
| 1 | <ul style="list-style-type: none"> • Negligible detrimental impact that is contained on-site and is fully reversible | <ul style="list-style-type: none"> • No negative coverage • Complaints but no action required | <ul style="list-style-type: none"> • Non-compliant action |

4) Pollutant Inventory

| Potential Pollutant | Location on Site | Type of Containment | Maximum Quantity On Site |
|------------------------------|---------------------------|---------------------|--------------------------|
| Sediment laden surface water | All exposed areas | excavation | N/A |
| Dust | All exposed areas | excavation | N/A |
| Chemicals and hydrocarbons | Adjacent to Site compound | Bunded container | 1000L |

5) Site Environmental Plan

The SEP will detail the following

- Location of all potential pollutants
- Location of pollution response equipment
- The surrounding area that is likely to be affected by a pollution incident
- The location of any stormwater drains on the premises

6) Pollution Incident Management

Internal Notification

